

- 2) Applicant had amended the claims to conform with Examiner's formal demands as expressed in a telephone interview, and to more particularly point out and distinctly claim applicant's invention.

5                   Applicant further added claims 91-97, the subject matter of which was described in the specifications, and that were inadvertently not claimed in the application as filed. Applicants submit that they are entitled to the benefit of the added claims.

It is submitted that all claims pending in the application, and/or as amended, are in form and substance in condition for allowance. Such action is promptly solicited.

- 10                 3) Applicant further submits herewith an Information Disclosure Statement reflecting results of an examination report by the United Kingdom patent office on a related application. A PCT International Search Report performed by the USPTO on a related PCT application did not add art to that which is already on record.
- 15                 4) The Examiner rejected all claims under 35 USC §103(a) as being unpatentable over Isaacson et al. (US Pat# 6,065,116) in view of Danknick et al. (US Pat. # 5,901,286). Some of the claim were similarly rejected under 35USC 103(a) over the two references above, and in view of additional references. Applicant respectfully submits that the Examiner overlooked key differences between the 116' and 286' references, as opposed to applicant's contributions.
- 20                 5) As pointed out in the specifications, at the core of applicant's invention is a novel method to **generate documentation** for configurable systems, using a computer. This is achieved by retrieving configuration parameters, directly or indirectly, from the configurable system, and using those parameters to create a document customized to the system as configured.
- 25                 6) Applicant further directs the Examiners attention to the passage in the application beginning at page 2, ll. 28which states *inter alia*:

30                   While most configurable systems provide means for reading and printing the system configuration data, a distinction should be drawn between raw configuration data and documentation. Raw configuration data often relates to a single system in a multi-system environment, and is mostly a cryptic list of variable names with their associated values, with little if any explanation of their meaning. An excellent example of raw configuration data

5

may be found in Windows Registry, which is a common configuration space for the Microsoft Windows® operating systems. Documentation on the other hand, is an organized collection of knowledge that, separately or in combination, represents the state or configuration of a system, teaches system operation, and aids in troubleshooting. Documentation is characteristically constructed of complete sentences in a human readable language, with appropriate punctuation, paragraph and optionally section separation...

10

15

In this passage, as well as in other places in the application, the applicant clearly draws **distinction between raw data and documentation**. Documentation involves more than a mere raw configuration data. Documentation as described in the passage mentioned above is descriptive in nature, thus allowing a clearer representation of the system to which it relates. The disclosure as a whole teaches how raw configuration data may be utilized to derive documentation, and how raw data may be advantageously embedded within a document, however mere display of raw data does not rise to the level of documentation. Applicant respectfully requests that this difference, as well as the primary function of generating documentation be applied to consideration of the patentability of all pending claims.

20

25

30

- 7) The 116' Isaacson et al. reference is directed towards automatically configuring a number of application programs that are resident on a number of computer platforms. Isaacson states clearly the problem his invention is attempting to solve in col. 2 ll.1-14 as "setting up application programs on multiple computer platforms is often time consuming... there are often a number of configuration type files that need to be updated or created... This is even more difficult when heterogeneous computer platforms ..." Isaacson et al. than goes on to state the function of his invention in col. 2 ll.17-22 as "for **automatically configuring** a number of application programs that are resident on a number of computer platforms so that each of the application programs can communicate with the others via the interconnection therebetween." (*emphasis added*) It is clear that the Isaacson invention is directed to an automatic configuration program rather than towards documentation generation. Isaacson does not teach the output of explanatory text segments corresponding to the configuration parameters to form the descriptive

documentation as in applicant's invention. Thus it is clear that the Isaacson reference has little if any bearing on the present invention

- 5                   8) Regarding the Danknick (US patent No. 5,901,286) reference, the problem that  
Danknick et al. attempt to solve is expressed in Col. 1, ll. 57-67 as to allow "a  
workstation to query and control a network peripheral through the peripheral's  
existing SNMP agent using industry standard tools already existing within the  
workstation" and the invention relates to "a system by which a network peripheral  
provides client workstations with the functionality required to communicate with the  
peripheral". While the Danknick reference relates to presenting certain data on  
10 fields on a screen, it does not rise to the level of providing a document as described  
above. Danknick et al. fails to disclose outputting explanatory text segments, and  
does not do more than a mere display of raw data, i.e. merely variable names and  
values.

15                  The Danknick reference relates to an apparatus and method for communicating with  
and controlling a network peripheral from a web browser, and not to a  
documentation generation system. Thus the Danknick invention as well has little if  
any bearing on the present invention. It should be noted that the present invention  
does contemplates using SNMP to collect configuration data from configurable  
system and their components, as well as using other components such as HTTP  
servers, etc.

- 20  
25                  9) Configuration programs and other inventions similar to those characterized by the  
cited and known art may benefit from use of the current invention or certain features  
thereof. Similarly, the current invention may be expanded to include a configuration  
module, or certain other features of the cited and known art may be implemented  
within embodiments of the present invention. Both cases shall not stray outside the  
scope of the present invention, as long as they provide automatic documentation of a  
configurable system. However, none of the art on record teaches nor suggests  
generating documentation reflecting the configurable system as configured, nor  
outputting explanatory text segments as claimed. The references do not show any

motivation to combine their features to provide the features of the present invention. Thus applicant submits that those references were improperly applied, and respectfully request they will be removed.

- 10) In light of the above, applicant believes he have shown claims 1, 36, 39, 43, 49, 78,  
5           80, 86, and all claims dependent therefrom, to be distinct, novel and unobvious over  
         the known art, and respectfully requests reconsideration and reversal of the rejection.  
10) The added claims, 90-97 are directed to other aspects or embodiments of the  
         invention while maintaining the general goal of outputting documentation responsive  
         to configuration parameters as described. Therefore, those claims are also believed to  
         be unaffected by the art of record, and applicant requests their allowance as well.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejection of the claims, and allowance of the application.

15           Respectfully submitted



Shalom Wertsberger, Agent for Applicant.

Reg. Num. 43,359  
20           30 Fern Lane  
         South Portland, ME 04106  
         Phone: (207) 799-9733; Fax: (207) 799-3698

25